

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

JOINT STIPULATION OF UNCONTESTED FACTS

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”), and Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A.J. Dwoskin & Associates, Inc. (“Defendants”), stipulate to the facts listed below for the purposes of this Action. The parties reserve the right to modify this stipulation and will continue to discuss additional potential stipulations of fact in advance of trial.

I. THE PARTIES

A. PLAINTIFFS

1. Plaintiffs live or lived at Waples Mobile Home Park (the “Park”).
2. Plaintiffs Jose Dagoberto Reyes (“Mr. Reyes”) and Rosy Giron de Reyes (“Mrs. Reyes”) are Latinos of Salvadorian national origin.
3. Plaintiffs Felix Alexis Bolaños (“Mr. Bolaños”) and Ruth Rivas (“Ms. Rivas”) are Latinos of Salvadorian national origin.

4. Plaintiffs Esteban Ruben Moya Yrapura (“Mr. Moya”) and Yovana Jaldin Solis (“Ms. Solis”) are Latinos of Bolivian national origin.

5. Plaintiffs Herbert David Saravia Cruz (“Mr. Saravia”) and Rosa Elena Amaya (“Ms. Amaya”) are Latinos of Salvadorian national origin.

6. The female Plaintiffs lived with their husbands at the Park.

B. DEFENDANTS

7. Defendant Waples Mobile Home Park Limited Partnership (“Waples L.P.”) is a Virginia company with its principal place of business at 9302 Lee Highway, Suite 300, Fairfax, Virginia 22031.

8. Defendant Waples Project Limited Partnership (“Waples Project L.P.”) is a Virginia company with its principal place of business at 3050 Chain Bridge Road, Suite 200, Fairfax, Virginia 22030.

9. Defendant A.J. Dwoskin & Associates, Inc. (“Dwoskin & Associates”) is Virginia real estate development and management firm with its principal place of business at 320-1 Jermantown Road, Suite 700, Fairfax, Virginia 22030.

10. At all relevant times, Dwoskin & Associates and its employees were agents of Waples Project L.P. and, with respect to the allegations in the Complaint, acted within the scope of that agency in signing the lease agreements and managing the Park.

II. THE PARK

11. Waples Mobile Home Park (the “Park”) is a manufactured or “mobile” home community located at 4307 Mobile Court, Fairfax, Virginia 22030.

12. Waples Project L.P. owns the Park.

13. Dwoskin & Associates operates the Park.

14. The Park is composed of approximately 150 lots on approximately 23 acres of land.

III. INDIVIDUAL TAXPAYER IDENTIFICATION NUMBERS

15. A person can acquire an Individual Taxpayer Identification Number (“ITIN”) if a person sends to the IRS: a completed Form W-7 with a valid passport and a copy of a tax return.

16. In issuing an ITIN, the IRS does not accept a photocopy of a foreign passport; rather, it requires the applicant either to submit the actual passport, or bring the passport to a designated office for inspection. No in-person interview is required of the applicant.

DATED: Washington, D.C.
February 2, 2017

By: /s/
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Paul Brinkman, VSB # 35950
Ariel Wade Trajtenberg (*pro hac vice*)
Joy Odom (*pro hac vice*)
Archith Ramkumar (*pro hac vice*)
Diego Durán de la Vega (*pro hac vice*)
Jongwook Kim (*pro hac vice*)

777 Sixth Street NW, 11th Floor
Washington, District of Columbia 20001
Phone: (202) 538-8000
Fax: (202) 538-8100
paulbrinkman@quinnmanuel.com
arieltrajtenberg@quinnmanuel.com
joyodom@quinnmanuel.com
archithramkumar@quinnmanuel.com
diegoduran@quinnmanuel.com
wookiekim@quinnmanuel.com

LEGAL AID JUSTICE CENTER
Simon Sandoval-Moshenberg, VSB #77110
Rebecca Wolozin, VSB #89690

6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Phone: (703) 778-3450
Fax: (703) 778-3454
simon@justice4all.org
becky@justice4all.org

Counsel for Plaintiffs

By: /s/
REED SMITH LLP
Grayson P. Hanes, VSB # 06614
Michael S. Dingman, VSB #30031
Justin deBettencourt, VSB # 83806

7900 Tysons One Place, Suite 500
McLean, Virginia 22102
Phone: (703) 641-4200
Fax: (703) 641-4340
ghanes@reedsmith.com
mdingman@reedsmith.com
jdbettencourt@reedsmith.com

Counsel for Defendants